

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,

Plaintiffs,

v.

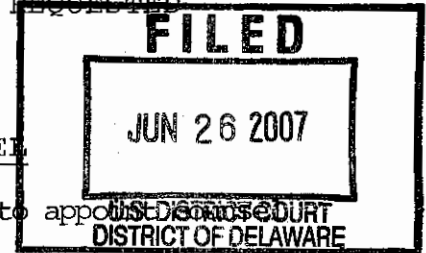
STANLEY TAYLOR, et al.,

Defendants.

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C.A. No. 05-823-***

JURY TRIAL REQUESTED



MOTION FOR THE APPOINTMENT OF COUNSEL

Plaintiffs, pursuant to § 1915, requests this court to appoint counsel to represent them in this case for the following reasons:

1. The plaintiffs are non-attorneys, and therefore cannot represent each other in this case.
2. The plaintiffs are unable to afford counsel.
3. The issues involved in this case are complex for non-attorney pro se plaintiffs to handle.
4. According to the "new" Warden at SCI prison, inmates are not allowed to "rely on other inmates to conduct legal work for them."
5. The twenty-six (26) plaintiffs are housed in different buildings throughout the prison compound, and are not allow to communicate with other inmates from different buildings.
6. The plaintiffs, have extremely limited access to the law library.¹ Inmates at the SCI prison are only allowed two (2) hours a week for law library.
7. Plaintiff George A. Jackson, has previously filed all the plaintiffs discovery pleadings in this matter. However, this case has not been certified as a class action and, as a non-attorney, he cannot represent the Plaintiffs.

¹ Law library is set up for 1 hour and 15 minutes twice a week for each building. But, due to other factors such as waiting to be call, getting a pass, the long walk across the compound, into the Pre-trial building, you are actually receiving 1 hour of access to law materials twice a week.

8. Plaintiff George A. Jackson, was attempting to keep the case moving for forward by filing discovery pleadings. But on May 30, 2007, after the reading and seizure of all his legal materials, he is without adequate legal material to further pursue litigation in this matter. (Refer to Motion for Default Judgment)

9. The plaintiffs has limited knowledge of law.

10. The case will require additional discovery of documents and depositions of a number of witnesses.

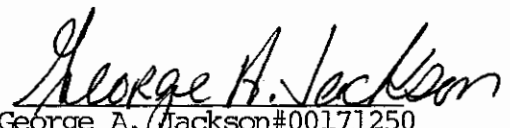
11. The case involves mechanical issues that may require expert testimony.


12. The testimony will be in sharp conflict, since the plaintiffs alleges that the Main Kitchen at Sussex Correctional Institution (SCI) in Georgetown, Delaware, has inadequate ventilation at the work place, while the defendants' in their Interrogatories each denied inadequate ventilation at the the SCI main kitchen.

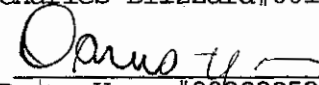
WHEREFORE, the plaintiffs motion for appointment of counsel should be granted.

DATED:

6/22/07


George A. Jackson#00171250


Charles Blizzard#00166670


Darus Young#00282852

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2007, I
filed MOTION FOR THE APPOINTMENT OF COUNSEL, by placing said
document in the S.C.I. prison mailbox to be forward to:

Eileen Kelly
Deputy Attorney General
Department of Justice
820 N. French St., 6th Fl.
Wilmington, DE 19801
Attorney for Defendants

George H. Jackson
Charles F. Blizzard
Danny Jr

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FOR THE DISTRICT OF DELAWARE

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Plaintiffs,	:	
	:	
v.	:	C.A. No. 05-823-***
	:	
STANLEY TAYLOR, et al.,	:	JURY TRIAL REQUESTED
	:	
Defendants.	:	

NOTICE OF MOTION

TO: ~~Eileen Kelly~~
Deputy Attorney General
Department of Justice
820 N. French St., 6th FL
Wilmington, DE 19801
Attorney for Defendants

COME NOW, Plaintiffs will present a Motion for the Appointment of Counsel
at the convenience of the Court.

DATED:

6/22/07

George A. Jackson
Charles F. Blizzard
Danwo

George H. Jackson
I/M: *George H. Jackson*
SUSSEX CORRECTIONAL INSTITUTION
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GEORGETOWN, DELAWARE 19947

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